



1 LAURA E. DUFFY  
2 United States Attorney  
3 MARK W. PLETCHER  
4 Assistant U.S. Attorney  
5 Colorado Bar No.: 034615  
6 ROBERT S. HUIE  
7 Assistant U.S. Attorney  
8 California Bar No.: 237374  
9 880 Front Street, Room 6293  
10 San Diego, CA 92101  
11 Tel: (619) 546-9714  
12 Email: [mark.pletcher@usdoj.gov](mailto:mark.pletcher@usdoj.gov)

13 WILLIAM J. STELLMACH  
14 Acting Chief, Fraud Section  
15 CATHERINE VOTAW  
16 D.C. Bar No.: 1012563  
17 BRIAN R. YOUNG  
18 Ohio Bar No.: 0078395  
19 Trial Attorneys, Fraud Section  
20 Criminal Division  
21 Tel: (202) 616-3114  
22 Email: [brian.young4@usdoj.gov](mailto:brian.young4@usdoj.gov)

23 Attorneys for the United States

24  
25 **UNITED STATES DISTRICT COURT**  
26  
27 **SOUTHERN DISTRICT OF CALIFORNIA**

28 UNITED STATES OF AMERICA,

Case No.: 13-CR-4287-JLS

**SUPERSEDING INFORMATION**

v.

JOSE LUIS SANCHEZ,

Defendant.

Title 18, U.S.C., Sec. 371 – Conspiracy to  
Commit Bribery  
Title 18, U.S.C., Sec. 201(b)(2)(A) and  
(C) – Bribery

The United States charges that, at all times relevant to this Information:

1           1. Defendant JOSE LUIS SANCHEZ is a Commander in the U.S. Navy  
2 who is currently stationed in San Diego, California. From about May 2012 until April  
3 2013, SANCHEZ served as the Executive Officer for the Commanding Officer of the  
4 Fleet Logistics Command ("FLC") in Yokosuka, Japan. FLC Yokosuka and other  
5 FLCs located in Asia were responsible for the solicitation, award, and oversight of  
6 contracts to entities that provided goods and services to the U.S. Navy. In his position  
7 as Executive Officer, SANCHEZ was involved in all the operational and  
8 administrative efforts performed by personnel within FLC Yokosuka and its  
9 subordinate FLC in Singapore. From about July 2010 until about May 2012,  
10 SANCHEZ was the Director of Operations for FLC Yokosuka, where he was  
11 responsible for the operations and administration of ashore logistics support for  
12 Seventh Fleet units. From about April 2008 to April 2010, SANCHEZ was the  
13 Deputy Logistics Officer for the Commander of the U.S. Navy Seventh Fleet in  
14 Yokosuka, Japan. As the Deputy Logistics Officer, SANCHEZ was responsible for  
15 assuring that all Seventh Fleet ships received the supplies and services needed to  
16 maintain readiness. At all times, as an Officer in the U.S. Navy, SANCHEZ was a  
17 "public official" as defined in 18 U.S.C. § 201(a).

18           2. GDMA was a multi-national corporation with headquarters in Singapore  
19 and operating locations throughout Asia, including in Japan, Thailand, the Philippines,  
20 and elsewhere. GDMA's main business was the "husbanding" of marine vessels,  
21 which involved the coordination, scheduling, and direct and indirect procurement of  
22 items and services required by ships and submarines when they arrived in port.  
23 GDMA had been husbanding vessels for the U.S. Navy for over 25 years under  
24 contracts with the U.S. Navy. In or around June 2011, the U.S. Navy awarded GDMA  
25 three regional contracts to provide husbanding services to U.S. ships and submarines  
26 throughout the Seventh Fleet's area of operations.

1       3.     Leonard Glenn Francis was the President and Chief Executive Officer of  
2 GDMA.

3       4.     It was a violation of SANCHEZ's official and lawful duties: (a) to  
4 transmit information that the U.S. Navy had classified as "Confidential" to any person  
5 not entitled to receive it; (b) to make unauthorized disclosure of proprietary, internal  
6 U.S. Navy information; and (c) to use his position and influence within the U.S. Navy  
7 to promote the interests of GDMA and Francis.

8                   COUNT 1 – CONSPIRACY TO COMMIT BRIBERY

9                           THE CONSPIRACY

10       5.     Beginning in or about September 2009, and continuing to in or about  
11 September 2013, on the high seas and outside the jurisdiction of any particular district,  
12 defendant U.S. Navy Commander JOSE LUIS SANCHEZ, a public official, Leonard  
13 Glenn Francis, and others knowingly and unlawfully conspired and agreed to commit  
14 bribery, in violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

15                           OBJECT OF THE CONSPIRACY

16       6.     It was the object of the conspiracy for SANCHEZ to demand, receive,  
17 and accept things of value from GDMA and Francis, including cash, travel and  
18 entertainment expenses, and the services of prostitutes, and in return SANCHEZ  
19 would provide GDMA and Francis with classified U.S. Navy ship schedules and other  
20 proprietary, internal U.S. Navy information, and would use his position and influence  
21 with the U.S. Navy to benefit GDMA.

22                           METHODS AND MEANS OF THE CONSPIRACY

23       7.     In furtherance of this conspiracy, and to accomplish its unlawful object,  
24 the following methods and means were used, among others:

25           a.     GDMA and Francis would give, offer, and promise things of value  
26 to or on behalf of SANCHEZ, including cash, travel and entertainment expenses, and  
27 the services of prostitutes.  
28

b. SANCHEZ would demand, seek, receive, accept and agree to receive and accept these things of value from GDMA and Francis.

c. In return for things of value, SANCHEZ would provide GDMA and Francis with classified U.S. Navy ship schedules and other proprietary, internal U.S. Navy information, and would use his position and influence with the U.S. Navy to benefit GDMA.

## OVERT ACTS

8. In furtherance of the conspiracy and to effect its unlawful object, the following overt acts, among others, were committed:

a. On or about July 21, 2011, Francis arranged and paid for a prostitute for SANCHEZ while SANCHEZ was in Singapore.

b. On or about May 8, 2012, Francis paid for SANCHEZ to stay at the Shangri-La, a luxury hotel in Singapore, for the period of May 14-19, 2012.

c. In or about July 2012, Francis paid over \$7,500 for SANCHEZ's travel from Asia to the United States.

d. On or about the following days, among others, SANCHEZ provided Francis with classified U.S. Navy ship and submarine schedules: September 14, 2009; September 16, 2009; October 6, 2009; June 13, 2010; February 5, 2011; April 11, 2011; and May 23, 2011.

e. On or about October 20, 2011, in reference to a port visit to Laem Chabang, Thailand, Francis sent an email to SANCHEZ asking him to “swing” [i.e. advocate for and advance GDMA’s interests] a U.S. Navy fuel purchasing decision “our way.” On or about October 21, 2011, SANCHEZ replied, “ask and you shall receive . . . we worked this out this morning . . . .” In October 2011, the USS Mustin did, in fact, conduct a port visit to Laem Chabang, during which the USS Mustin purchased fuel from GDMA.

All in violation of Title 18, United States Code, Section 371.

1                                    COUNT 2 – BRIBERY

2            9.     The allegations in Paragraphs 1 through 4 and 6 through 8 of this  
3 Superseding Information are hereby re-alleged and incorporated by reference.

4            10.    Beginning in or about September 2009, and continuing until in or about  
5 September 2013, on the high seas and outside the jurisdiction of any particular district,  
6 defendant U.S. Navy Commander JOSE LUIS SANCHEZ, a public official, directly  
7 and indirectly, corruptly demanded, sought, received, and accepted things of value  
8 from GDMA and Francis, including cash, travel and entertainment expenses, and the  
9 services of prostitutes, in return for SANCHEZ being influenced in the performance  
10 of official acts, and in return for SANCHEZ being induced to do and omit to do acts  
11 in violation of his official duties, including providing to GDMA and Francis classified  
12 and other proprietary, internal U.S. Navy information and using his position and  
13 influence with the U.S. Navy to benefit GDMA, all in violation of Title 18, United  
14 States Code, Sections 201(b)(2)(A) and (C).

15                                    FORFEITURE ALLEGATIONS

16            11.    The allegations set forth in Paragraphs 1 through 10 of this Information  
17 are incorporated by reference for the purpose of alleging forfeiture pursuant to Title  
18 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code,  
19 Section 2461(c).

1        12. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby  
2 given to the above-named defendant that the United States will seek forfeiture as part  
3 of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(c),  
4 and Title 28, United States Code, Section 2461(c), including but not limited to all  
5 property, real or personal, which constitutes or is derived from proceeds traceable to  
6 bribes or a bribery conspiracy, as alleged in this Information.

7  
8        DATED: January 6, 2015.

9                                LAURA E. DUFFY  
10                                United States Attorney

11  
12        By: 

13                                MARK W. PLETCHER  
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23                                Fraud Section  
24                                U.S. Department of Justice  
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